# UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

October 17, 2022 3:37 PM
CLERK OF COURT
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BYJMW SCANNED BY: JU / 10-17

UNITED STATES OF AMERICA.

Plaintiff,

1:22-cr-142 Robert J. Jonker U.S. District Judge

CLASS A MISDEMEANOR

INFORMATION

VS.

MIKAELA HALL,

Defendant.

The United States Attorney charges:

#### COUNT 1

(Conspiracy to Introduce Misbranded Drugs Into Interstate Commerce)

Beginning in or about February 2020 and continuing until in or about December 2020, in Muskegon County, in the Southern Division of the Western District of Michigan and elsewhere, the defendant,

### MIKAELA HALL,

knowingly and voluntarily combined, conspired, confederated, and agreed with others, both known and unknown, to introduce misbranded prescription drugs into interstate commerce contrary to law.

18 U.S.C. § 371

21 U.S.C. § 331(a)

21 U.S.C. § 353(b)(1)

21 U.S.C. § 333(a)(1)

### COUNTS 2-6

(Introduction of Misbranded Drugs Into Interstate Commerce)

On or about the following dates, in Muskegon County, in the Southern Division of the Western District of Michigan, the defendant,

## MIKAELA HALL,

introduced and delivered, and caused to be introduced and delivered, into interstate commerce, the following misbranded prescription drugs, as defined in Title 21, United States Code, Section 353(b)(1), in that they were dispensed without a written prescription of a practitioner licensed by law to administer such drugs:

Count	Date	Recipient	Misbranded Prescription Drug – Trade Name	Misbranded Prescription Drug – Product Name	Intended Destination
2	7/24/2020	K.W.	Cytotam	Tamoxifen Citrate	Wilmington, NC
3	7/27/2020	N.D.	Arimimed	Anastrozole	Port Jefferson Station, NY
4	9/29/2020	K.S.	Modvigil	Modafinil	Holly Springs, NC
5	10/16/2020	C.P.	Vilitra	Vardenafil	Atlanta, GA
6	10/16/2020	J.B.	Tamoxifen	Tamoxifen Citrate	West Hollywood, CA

and aided, abetted, counseled, commanded, induced, and procured the same.

21 U.S.C. § 331(a)

21 U.S.C. § 353(b)(1)(B)

21 U.S.C. § 333(a)(1)

18 U.S.C. § 2

MARK A. TOTTEN

United States Attorney

Date: October 17, 2022

STEPHANIE M. CAROWAN

Assistant United States Attorney